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Via ECF
Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: 22-cv-02299-LGS
       Network Data Rooms, LLC v. Saulrealism LLC et al

Dear Judge Schofield,

Allyn & Fortuna LLP represents the plaintiff Network Data Rooms, LLC ("Plaintiff") in connection with the above-referenced action.

I am writing in response to this Court's Order (Document No. 93) directing Plaintiff to produce the names of all Azure DevOps repositories and projects it has used from December 2020 through the present. Attached please find a list of 13 projects and the repositories for each project, if any, that are on Plaintiff's DealTable Azure DevOps account. All 13 projects are listed and accessible upon logging into the DealTable Azure DevOps site and would have been seen by Terry Patterson when he accessed Plaintiff's Azure account. See attached screenshot. Furthermore, the repositories under each project can be accessed by clicking on the "Repos" link within the project. Therefore, contrary to Defendants' letter, there has never been any attempt by Plaintiff to withhold the "quantity of repositories" or to hide anything from Terry Patterson. I would like to further note that Defendants' counsel never requested this information directly from Plaintiff. Instead, Defendants' counsel went directly to the court asking for the court to order production of this information to erroneously suggest that Terry Patterson's reports is unreliable.

As previously stated, Terry Patterson had full administrative access to Plaintiff's system. Mr. Patterson was able to freely access all information and projects. *See* Document No. 49, pg. 1. Furthermore, Defendants worked in the Plaintiff's systems, were undoubtedly aware of the various projects on the DealTable Azure DevOps account and had the opportunity to make sure Mr. Patterson reviewed any and all projects Defendants thought were relevant as part of Mr. Patterson's Second and/or Third Supplemental reports.

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Thank you for your consideration.

Respectfully submitted,

/s/

Nicholas Fortuna

Cc: Renee Wong, Esq. (via ECF)

List of All Projects and Repositories within each Project on Plaintiff's Azure DevOps Account

- Project Name: ndr_frontend (Dates back to 2/4/16 and relates to code developed before Plaintiff purchased the software.)
  Repositories:
    - App
    - Deploy
    - Fake_data
    - Fonts
    - Images
    - Libs
    - Manifests
    - Ndr-fe
    - .bowerr.c
    - .gitignore
    - Apple-app-site-association
    - Azure-pipelines-1.yml
    - Azure-pipelines.yml
    - Bitbucket-pipelines.yml
    - Bower.json
    - Env-conf.json
    - Favicon.png
    - Gulpfile.js
    - Index-embed-login.tpl.html
    - Index-embed.tpl.html
    - Index.js
    - Index.tpl.html
    - Package-lock.json
    - Package.json
    - Procfile
    - README.md

- Project Name: ndr_backend (Dates back to 2/25/16 and relates to code developed before Plaintiff purchased the software.)
  Repositories:
    - Api
    - Apple
    - Bank_box
    - Common
    - Deal
    - Manifests
    - Message
    - Profile
    - Sharing
    - Storage
    - Templates
    - .gitignore
    - Azure-pipelines (1).yml

- o   Azure-pipelines-1.yml
- o   Azure-pipelines-2.yml
- o   Azure-pipelines.yml
- o   Cognito.py
- o   Dockerfile
- o   Docusign.pem
- o   K8sver
- o   Manage.py
- o   README.md
- o   Requirements.txt
- o   Runtime.txt

- Project Name: NDR (No date history)
  - o   There are no repositories or code for this project.

- Project Name: NDR_FE (No date history)
  - o   There are no repositories or code for this project.

- Project Name: Infrastructure (9/29/20)
  Repositories:
  - o   .gitignore
  - o   CognitoUsers.csv
  - o   Docker-compose.yml
  - o   Dockerfile
  - o   Old_repository.zip
  - o   Settings.zip
  - o   UserinvitePruned.csv
  - o   UserInviteTemplate.csv

- Project Name: ndr_frontend_v2 (10/8/2020)
  Repositories:
  - o   E2e
  - o   Src
  - o   .browserslistrc
  - o   .editorconfig
  - o   {
  - o   {thisuser
  - o   Angular.json
  - o   Karma.conf.js
  - o   Package-lock.json
  - o   Package.json
  - o   README.md
  - o   Tailwind.config.js
  - o   Tsconfig.app.json
  - o   Tsconfig.json
  - o   Tsconfig.spec.json
  - o   Tslint.json
  - o   Webpack.config.js

- Project Name: NDR-DEV (11/12/20)
  Repositories:
    - Infrastructure
    - Ndr_backend
    - Ndr_frontend
    - Ndr_frontened-v2
    - Ndr-DEV-CODE
    - Test
    - XOPS-DEMO
    - XOPS-PASINDU

- Project Name: NDR 2021 (1/18/21)
  Repositories:
    - .vs
    - DealTable
    - .gitignore

- Project Name: Dealtable-Website (2/23/21)
  Repositories:
    - Dealtable_Designed_Website
    - Packages
    - Dealtable_Designed_Website.sln

- Project Name: DealTable_CusomterService (5/9/21)
  Repositories:
    - DealTable_CS_APP

- Project Name: Dealtable Old Development (2/10/22 created for work that was to be performed by new developer hired after Defendants' termination.)
  Repositories:
    - .vs
    - DealTable
    - Ndr_Backend
    - Ndr_frontend
    - Ndr_frontend_v2
    - .gitignore
    - DealTable.sln

- Project Name: DealTable Code Repo 2022
  Repositories:
    - 2022 Code Base
    - DealTable Development

- Project Name: DealTable 2022 GITHUB SourceCode (No date history)
    - There are no repositories or code for this project.

Azure DevOps

D Dealtable

New organization

Dealtable

Projects   My work items   My pull requests

Filter projects

N NDR-2021 New NDR 2021 Code	**DR** DealTable Code Repo 2022 This code Repo was created on 2/20/2022 by DJD to recompile and correct code issues and start afresh	**N** NDR-DEV	**DD** Dealtable Old Development

DS DealTable 2022 GITHUB SourceCode

DR DealTable Code Repo 2022
This code Repo was created on 2/20/2022 by DJD to recompile and correct code issues and start afresh

DD Dealtable Old Development

D DealTable_CustomerService

D Dealtable-Website
Official Website Code- This is in VS - TFS- for eay deployment

I Infrastructure

N NDR

N ndr_Backend

N NDR_FE

N ndr_frontend

N ndr_frontend_v2

N NDR-2021
New NDR 2021 Code

N NDR-DEV

Organization settings